



August 2017

CONFLICT MINERALS

Information on Artisanal Mined Gold and Efforts to Encourage Responsible Sourcing in the Democratic Republic of the Congo

GAO Highlights

Highlights of [GAO-17-733](#), a report to congressional committees

Why GAO Did This Study

Over the past decade, the United States and the international community have sought to improve security in the DRC, the site of one of the world's worst humanitarian crises. In the eastern DRC, armed groups have committed severe human rights abuses, including sexual violence, and reportedly profit from the exploitation of "conflict minerals," particularly gold. Congress included a provision in the 2010 Dodd-Frank Wall Street Reform and Consumer Protection Act that, among other things, required the Securities and Exchange Commission (SEC) to promulgate regulations regarding the use of conflict minerals from the DRC and adjoining countries. The SEC adopted these regulations in 2012. The act also included a provision for GAO to annually assess the SEC regulations' effectiveness in promoting peace and security and report on the rate of sexual violence in the DRC and adjoining countries. In April 2017, GAO reported on companies' disclosures, in response to the SEC regulations, of conflict minerals they used in calendar year 2015 (see [GAO-17-517R](#)).

In this report, GAO provides information about (1) the supply chain for ASM gold in the DRC; (2) efforts to encourage responsible sourcing of ASM gold; and (3) sexual violence in eastern DRC and neighboring countries published since August 2016, when GAO last reported on this topic. GAO reviewed U.S., UN, and nongovernment and international organizations' reports; interviewed U.S., DRC, and United Arab Emirates (UAE) officials and other stakeholders; and conducted fieldwork in Dubai, UAE.

GAO is not making any recommendations.

View [GAO-17-733](#). For more information, contact Kimberly M. Gianopoulos at (202) 512-8612 or gianopoulosk@gao.gov.

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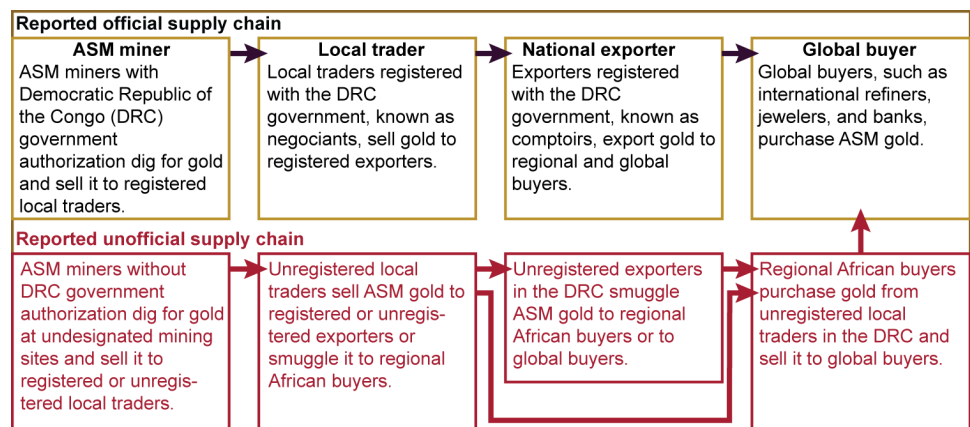
CONFLICT MINERALS

Information on Artisanal Mined Gold and Efforts to Encourage Responsible Sourcing in the Democratic Republic of the Congo

What GAO Found

The supply chain for artisanal and small-scale mined (ASM) gold—a significant driver of the Democratic Republic of the Congo (DRC) economy—involves multiple actors, according to reports GAO reviewed and stakeholders interviewed (see figure). Officially, these actors are required to obtain DRC government authorization and pay provincial or national taxes to mine, trade, or export ASM gold, according to these sources. However, almost all DRC-sourced ASM gold is produced and traded unofficially and smuggled from the country, according to reports and stakeholders. Further, elements of the Congolese army as well as illegal armed groups, frequently exploit ASM gold, often through illegal taxes on its production and transport, according to reports and stakeholders.

Illustration of Reported Official and Unofficial Supply Chains for Artisanal and Small-Scale Mined (ASM) Gold in the Democratic Republic of the Congo



Sources: GAO analysis of reports by U.S. agencies, the United Nations (UN), and nongovernmental and international organizations and of interviews with government and nongovernment stakeholders. | [GAO-17-733](#)

The DRC government, the U.S. Agency for International Development (USAID), and international organizations have undertaken several initiatives to encourage the responsible sourcing of ASM gold—that is, the production and traceability of gold that has not financed conflict or human rights abuses such as sexual violence. For example, since 2015, USAID has worked with the DRC government to implement a traceability scheme for ASM gold and has worked with Tetra Tech and Partnership Africa Canada to scale up pilot initiatives for the production and sale of conflict-free ASM gold. However, the limited number of mines validated as conflict free and the relatively high mining-related official provincial taxes in the DRC, compared with taxes in neighboring countries, provide few incentives for responsible sourcing of ASM gold, according to reports GAO reviewed.

In 2016, a USAID-funded, population-based study of the rate of sexual violence in parts of the eastern DRC estimated that 32 percent of women and 33 percent of men in these areas had been exposed to some form of sexual and gender-based violence in their lifetime. According to the United Nations, the DRC government has taken some steps to address sexual violence in the eastern region.

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Abbreviations

| | |
|----------------|--|
| ASM | artisanal and small-scale mined |
| Dodd-Frank Act | Dodd-Frank Wall Street Reform and Consumer Protection Act |
| DRC | Democratic Republic of the Congo |
| FARDC | Armed Forces of the Democratic Republic of the Congo |
| ICGLR | International Conference on the Great Lakes Region |
| IPIS | International Peace Information Service |
| ITOA | Initiative de Traçabilité de l'Or d'Exploitation Artisanale (Traceability Initiative for Artisanal Gold) |
| LBMA | London Bullion Market Association |
| MONUSCO | UN Organization Stabilization Mission in the Democratic Republic of the Congo |
| NGO | nongovernmental organization |
| OECD | Organization for Economic Co-operation and Development |
| PAC | Partnership Africa Canada |
| SAESSCAM | Support Service and Management of Small Scale Mining |
| SEC | Securities and Exchange Commission |
| State | Department of State |
| UAE | United Arab Emirates |
| UN | United Nations |
| UNGoE | UN Group of Experts |
| USAID | U.S. Agency for International Development |
| ZEA | zone d'exploitation artisanal |

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August 23, 2017

Congressional Committees

Over the past decade, the United States and the international community have sought to improve security in the Democratic Republic of the Congo (DRC), the site of one of the world’s worst humanitarian crises. In the eastern DRC, millions have died and thousands have been displaced from their homes. Moreover, various armed groups have committed severe human rights abuses, including sexual violence, and profit from exploiting the mining and trade of “conflict minerals,” particularly gold, according to the United Nations Group of Experts (UNGoE).¹ Reports have indicated progress in reducing armed groups’ exploitation of the other three conflict minerals—tin, tantalum, and tungsten—but very little progress with regard to gold.² Efforts by international organizations and by the U.S. and DRC governments have begun to focus on establishing guidance and regulatory frameworks aimed at encouraging the sourcing of conflict-free artisanal and small-scale mined (ASM) gold produced in the DRC (i.e., ensuring that such gold has not directly or indirectly financed conflict or human rights abuses), also known as responsible sourcing. However, these efforts are still preliminary and mostly in pilot phases.

Section 1502 of the 2010 Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act) includes a provision regarding the exploitation of conflict minerals and requires several U.S. agencies to take certain actions to implement the act’s conflict minerals provisions.³

¹The Dodd-Frank Wall Street Reform and Consumer Protection Act defines conflict minerals as columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, or any other mineral or its derivatives that are determined by the Secretary of State to be financing conflict in the DRC or an adjoining country. See Pub. L. No. 111-203, § 1502(e)(4), 124 Stat. 1376, 2218 (2010). Tantalum, tin, and tungsten are derivatives of columbite-tantalite, cassiterite, and wolframite, respectively.

²Yannick Weyns, Lotte Hoex, and Ken Matthyssen, *Analysis of the Interactive Map of Artisanal Mining Areas in Eastern DR Congo* (Antwerp, Belgium: International Peace Information Service, October 2016); United Nations Security Council, *Letter Dated 23 May 2016 from the Group of Experts on the Democratic Republic of the Congo Addressed to the President of the Security Council*, S/2016/466 (May 23, 2016); and Organisation for Economic Co-operation and Development, *Report on the Implementation of the Recommendation on Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* (Paris, France: Apr. 28, 2016).

³Pub. L. No. 111-203, § 1502.

For example, the act requires the Department of State (State), in consultation with the U.S. Agency for International Development (USAID), to submit a conflict minerals strategy to appropriate congressional committees to address the linkages between human rights abuses, armed groups, mining of conflict minerals, and commercial products.⁴ The Dodd-Frank Act also required the Securities and Exchange Commission (SEC) to promulgate disclosure and reporting regulations regarding the use of conflict minerals from the DRC and adjoining countries by April 2011.⁵ The SEC adopted a conflict minerals disclosure rule in August 2012 and published the adopting release in the *Federal Register* in September 2012.⁶ In addition, the Dodd-Frank Act included a provision for GAO to report on the effectiveness of the SEC rule in promoting peace and security in the DRC and adjoining countries and to report on the rate of sexual violence in war-torn areas of the DRC and adjoining countries, among other things.⁷ In April 2017, we issued a report examining conflict mineral disclosures that companies filed with the SEC in 2016.⁸

⁴See Pub. L. No. 111-203, § 1502(c). Section 1502 of the act defines “appropriate congressional committees” to mean the Committee on Appropriations, the Committee on Foreign Affairs, the Committee on Ways and Means, and the Committee on Financial Services of the House of Representatives; and the Committee on Appropriations, the Committee on Foreign Relations, the Committee on Finance, and the Committee on Banking, Housing, and Urban Affairs of the Senate.

⁵Pub. L. No. 111-203, § 1502(b). When the SEC issued its conflict minerals rule, the countries adjoining the DRC comprised Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia. For information on the April 3, 2017, U.S. District Court for the District of Columbia’s final judgement on the SEC rule, see GAO, *SEC Conflict Minerals: 2017 Review of Company Disclosures in Response to the U.S. Securities and Exchange Commission Rule*, [GAO-17-517R](#) (Washington, D.C.: Apr. 26, 2017).

⁶77 Fed. Reg. 56,274. According to the SEC, when the SEC proposes or adopts a set of rules, those rules are published in a document called a “proposing release” or “adopting release.”

⁷Pub. L. No. 111-203, § 1502(d), as amended by the GAO Mandates Revision Act, Pub. L. No. 114-301, § 3, 130 Stat. 1514 (2016). GAO is required to report on the effectiveness of the SEC rule annually from 2012 through 2020, with additional reports in 2022 and 2024. GAO is also required to report on the rate of sexual violence from 2011 through 2020, with additional reports in 2022 and 2024. This report contributes to our work in response to the annual reporting requirements in Section 1502 of the Dodd-Frank Act. For a list of our related work, see the Related GAO Products page.

⁸[GAO-17-517R](#). We reported that while not all companies had disclosed the conflict minerals they used, an estimated 61 percent of those that disclosed this information reported using tin, 54 percent reported using tantalum, 58 percent reported using tungsten, and 55 percent reported using gold.

In this report, we provide information about (1) the supply chain for gold produced through artisanal and small-scale mining in the DRC, (2) efforts by the DRC and the U.S. government and others that may encourage responsible sourcing of ASM gold, and (3) sexual violence in the eastern DRC and neighboring countries that has been published since we issued our August 2016 report.⁹

To obtain information about the supply chain for ASM gold produced in the DRC, we reviewed key reports from USAID, nongovernmental organizations (NGO), and international organizations.¹⁰ To obtain information about efforts to encourage responsible sourcing of ASM gold from the DRC, we reviewed reports from USAID and international organizations. We also conducted interviews with State and USAID officials; DRC government officials; NGO officials; industry group representatives; and researchers in Santa Clara, California,¹¹ and in Washington, D.C., regarding the supply chain for ASM gold and efforts to encourage responsible sourcing.¹² In addition, we conducted fieldwork in the United Arab Emirates (UAE), where we interviewed UAE government officials, gold refiners, and representatives of auditing firms to obtain their perspectives on the supply chain for ASM gold and key efforts that have been undertaken to encourage the responsible sourcing of ASM gold.¹³ To identify recently published information about sexual violence in the DRC and neighboring countries, we interviewed, and requested key documents from researchers and representatives of U.S. agencies and

⁹See GAO, *SEC Conflict Minerals Rule: Companies Face Continuing Challenges in Determining Whether Their Conflict Minerals Benefit Armed Groups*, [GAO-16-805](#) (Washington, D.C.: Aug. 25, 2016).

¹⁰All statements about the supply chain for ASM gold produced in the DRC are based primarily on our review of 21 relevant reports by U.S. agencies, NGOs, and international organizations. We conducted Internet searches to identify academic articles and reports on the supply chain of ASM gold in the DRC. We reviewed these reports for methodological rigor, relevance, and timeliness to ensure that they were sufficiently reliable to support their own conclusions or conclusions we made based on their work. We also reviewed methodologies related to site selection, sources and quality of evidence, and the nature and timing of fieldwork in the DRC. For a complete list of these reports, see the bibliography.

¹¹We interviewed NGO and industry representatives attending an annual industry conference on conflict minerals to obtain their perspectives on the supply chain of ASM gold.

¹²The views of these representatives are not generalizable.

¹³These representatives were identified by the U.S. embassy and consulate in Dubai, UAE.

several United Nations (UN) agencies. See appendix I for more information about our objectives, scope, and methodology.

We conducted this performance audit from August 2016 to August 2017 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Artisanal and small-scale mining of gold in the DRC is a significant driver of the country's economy. ASM gold mining in the DRC employs a large number of people, constitutes a potential major source of tax revenue, and represents a potential engine of development for the country, according to a 2015 study by USAID.¹⁴ More than 1,000 ASM gold mine sites of varying size operate in the DRC, primarily in remote provinces in the eastern region, commonly employing groups of 30 to 300 miners (see app. II for a map showing DRC provinces). In parts of the DRC, artisanal and small-scale mining provides alternative employment opportunities in the absence of a viable agricultural sector. In addition, mining—including ASM gold mining—provides miners with cash-on-hand and requires little or no specialized knowledge.¹⁵

ASM gold miners work as diggers, rock crushers, sorters, and traders. Most ASM gold miners use shovels, picks, and other rudimentary tools, such as mining pans. Because of the scarcity of mechanical equipment in some areas, ASM gold miners grind the mined gold manually into a powder, often with a pair of rocks or a tire rim, and extract gold from this powder using a sluice, mining pan, and washing pool and sometimes using hazardous chemicals such as mercury (see fig. 1).

¹⁴Shawn Blore, *Capacity Building for a Responsible Minerals Trade (CBMRT): Working with Producers to Responsibly Source Artisanal Gold from the Democratic Republic of the Congo* (Washington, D.C.: U.S. Agency for International Development, May 2015). Additionally, a 2016 International Peace Information Service (IPIS) report estimates, based on fieldwork conducted in 2013 and 2015, that ASM gold mining employs approximately 80 percent of all ASM miners in the eastern DRC. See Weyns, Hoex, and Matthysen, *Analysis of the Interactive Map of Artisanal Mining Areas*.

¹⁵Jocelyn T.D. Kelly, "This Mine Has Become Our Farmland": Critical Perspectives on the Coevolution of Artisanal Mining and Conflict in the Democratic Republic of the Congo," *Resources Policy*, vol. 40 (January 2014): 100–108.

Figure 1: Example of Artisanal Miners Using Rudimentary Tools to Extract Gold in the Democratic Republic of the Congo



Source: International Peace Information Service. | GAO-17-733

According to a 2016 study by the International Peace Information Service (IPIS), ASM gold mining sites in the eastern DRC annually produced a combined total of about 12 metric tons of gold, with an estimated value of \$437 million, in 2013 through 2015.¹⁶ This study found that a miner produced an average of 0.17 grams per day, worth about \$6.07 on global markets, but retained earnings of \$1.84 to \$2.75 per day. However, significant portions of many miners' wages went toward paying off loans (i.e., prefinancing) that the miners incurred for food, tools, and other basic necessities. As a result, when production levels were low, miners could easily enter a cycle of indebtedness.

According to the government of the DRC, the average annual official ASM gold production in 2010 through 2016 was about 279 kilograms (0.28 metric tons) of gold, with an estimated value of \$10.1 million per year. Total official ASM gold production was about 1,955 kilograms (1.95 metric tons), with an estimated value of about \$71 million in 2010 through 2016 (see table 1).¹⁷

¹⁶IPIS's estimate of the annual amount of ASM gold produced is based on estimates of gold production from ASM gold mine sites visited in 2013 to 2015. IPIS's estimate for the value of ASM gold is based on the price of gold at mine sites where IPIS collected data, which ranged from an average of about \$40 in 2013 to an average of about \$36 in 2015 per gram of gold.

¹⁷These data, provided by the Centre d'Évaluation, d'Expertise et de Certification—a DRC government entity responsible for monitoring official exports—illustrate the overall magnitude of gold production accounted for in official statistics. We did not independently verify or determine the reliability of these data because of limited access to the underlying documentation and DRC government officials who prepared the data. See app. I for more information about our methodology.

Table 1: Reported Annual Amounts and Estimated Value of Officially Produced Artisanal and Small-Scale Mined Gold in the Democratic Republic of the Congo, 2010-2016

| Calendar year | Amount (kg) | Estimated value (2016 constant dollars) |
|---------------|--------------|---|
| 2010 | 178 | 6,494,006 |
| 2011 | 116 | 5,321,838 |
| 2012 | 135 | 6,063,550 |
| 2013 | 279 | 10,541,885 |
| 2014 | 743 | 26,226,143 |
| 2015 | 274 | 9,010,673 |
| 2016 | 231 | 7,453,471 |
| Total | 1,955 | 71,111,567 |

Source: Democratic Republic of the Congo (DRC) Centre d'Évaluation, d'Expertise et de Certification (CEEC). | GAO-17-733

Note: Dollar amounts shown are adjusted for inflation to 2016 dollars. CEEC data for the value of ASM gold may not reflect world gold prices. In 2016, about 30 metric tons of industrial gold was produced in the DRC, according to CEEC.

Reported Supply Chain for DRC-Sourced ASM Gold

The reported official supply chain for ASM gold produced in the DRC involves multiple key actors authorized by the DRC government, according to reports we reviewed and stakeholders we interviewed.¹⁸ However, these and other sources indicate that the vast majority of DRC-sourced ASM gold is mined, traded, and exported unofficially, without authorization.¹⁹ Additionally, the majority of ASM gold miners reportedly work in the presence of elements of the Congolese army or illegal armed actors, according to a report and stakeholders.

¹⁸In this report, “official” refers to aspects of the supply chain where participants register or report to the DRC government.

¹⁹In this report, “unofficial” refers to aspects of the supply chain where participants do not register or report to the DRC government.

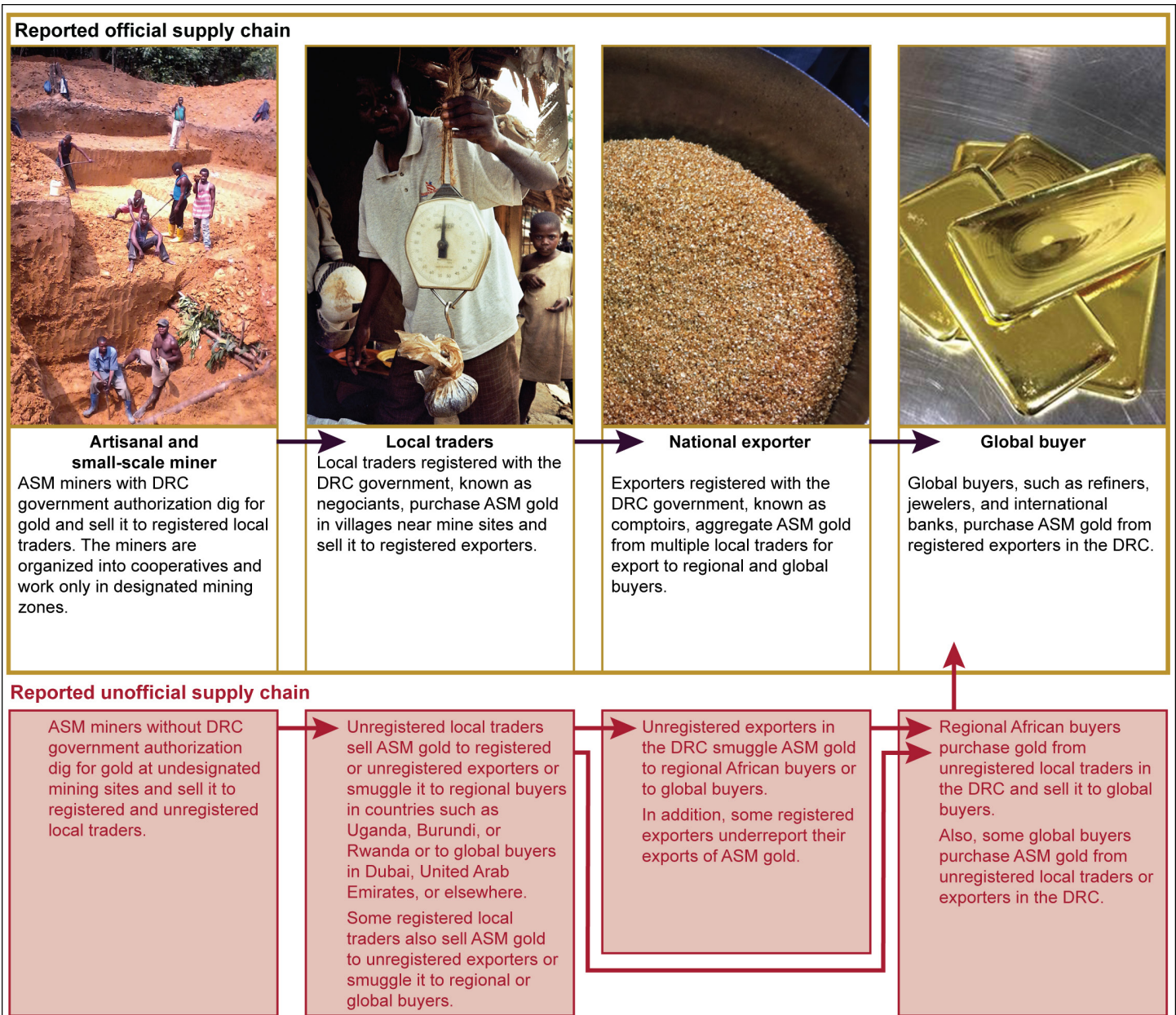
Reported Official Supply Chain for DRC-Sourced ASM Gold Involves Multiple Actors, but Almost All ASM Gold Is Reportedly Smuggled

The official supply chain for ASM gold produced in the DRC involves multiple actors, including miners, local traders, and exporters, according to USAID and UNGoE reports we reviewed and stakeholders we interviewed.²⁰ Those sources indicated that these key actors are required to obtain government authorization, such as official mining cards, or register with the provincial or national government to trade or export ASM gold in the DRC. However, according to these reports and stakeholders, almost all DRC-sourced ASM gold is produced and traded unofficially and smuggled from the country.²¹ Figure 2 illustrates the reported official and unofficial supply chains for DRC-sourced ASM gold.

²⁰Blore, *Capacity Building for a Responsible Minerals Trade*; United Nations Security Council, *Letter Dated 23 May 2016 from the Group of Experts*. These reports reflect fieldwork completed in 2014 through 2016, respectively.

²¹Estimating the size of trade in unofficial markets is inherently difficult, and reports we reviewed took different approaches, over different time periods, to estimate total production and trade in ASM gold.

Figure 2: Illustration of Reported Official and Unofficial Supply Chains for Artisanal and Small-Scale Mined (ASM) Gold in the Democratic Republic of the Congo (DRC)



Sources: GAO analysis of reports by U.S. agencies, the United Nations (UN), and nongovernmental and international organizations and of interviews with government and nongovernment stakeholders; (photos, left to right) International Peace Information Services (IPIS), IPIS, GAO, GAO. | GAO-17-733

Notes: Illustrations of the reported official and unofficial supply chains for ASM gold produced in the DRC are based on information in U.S. agency, UN, OECD and NGO documents we reviewed and from stakeholders we interviewed. These stakeholders included, among others, officials of the U.S.

and DRC governments and the UN Group of Experts; representatives of international and nongovernmental organizations; and representatives of gold refineries, auditing firms, local traders, and jewelers in Dubai, United Arab Emirates.

According to these sources, unregistered local traders or exporters generally sell DRC-sourced ASM gold to regional buyers in Uganda, Burundi, or Rwanda or global buyers in Dubai, United Arab Emirates.

The USAID and UNGoE reports we reviewed and stakeholders we interviewed generally described the official supply chain for DRC-sourced ASM gold as follows:²²

- Artisanal and small-scale miners purchase government mining cards and join cooperatives, which allows them to work in artisanal mining zones known as the *zone d'exploitation artisanal* (ZEA). According to a USAID report, ASM gold is considered legal under DRC law when it is produced by a registered cooperative working within a ZEA or a mining area that has been inspected and found to be “green”—that is, conflict free²³—within the past year by a government-accredited, validated mission.²⁴ Miners in provinces where most of the ASM gold

²²Blore, *Capacity Building for a Responsible Minerals Trade*; United Nations Security Council, *Letter Dated 23 May 2016 from the Group of Experts*.

²³The International Conference on the Great Lakes Region (ICGLR) uses the color-based validation scheme defined in the guidance of the Organisation for Economic Co-operation and Development and the regional certification mechanism. According to this scheme, a “green” mine meets all standards (i.e., no conflict or child labor) and can produce minerals for certified export. A “yellow” mine has infractions of one or more important criteria but can produce minerals for certified export; the mine operator has 6 months to resolve the infractions. A “red” (uncertified) mine has grave infractions of one or more critical criteria and remains red until a further inspection shows the infractions to have been resolved. A red mine is prohibited from producing minerals for a minimum of 6 months.

²⁴Blore, *Capacity Building for a Responsible Minerals Trade*. According to the report, miners can dig at a ZEA or mining concession site if the site’s concession holder can ensure that the site has been validated. Since 2011, a joint mine site validation mission, directed by the DRC government, has sent teams to inspect mine sites and operations for illegal taxation or control by armed groups—no conflict and no child labor, among other things, according to a DRC Ministry of Mines report. The joint mission is funded by the German and U.S. governments and includes other stakeholders. The inspections determine whether the mine site conforms to the ICGLR regional certification mechanisms. According to the Ministry of Mines report, as of April 2016, 37 of the 53 gold mine sites inspected were green, 5 were yellow, 6 were red, and 5 were not classified.

is produced are subject to an average provincial production tax of about 8 percent, according to USAID.²⁵

- Local traders, known as *negociants*, register with the government to purchase gold from villages near mine sites and sell it to larger traders or exporters. Generally, there are two types of local traders: *petit negociants*, who buy and sell small quantities (one-half gram or less), and *grande negociants*, who buy and sell larger quantities (1 to 50 kilograms) of gold.²⁶ According to a USAID report, registered local traders in these provinces are subject to an average provincial tax of about 1 percent on sales volume.
- National exporters, known as *comptoirs*, register with the national government to export gold purchased from the local traders. Registered exporters are subject to a 2 percent national export tax, according to a USAID report.
- Global buyers, including international refiners, jewelers, and banks, buy ASM gold from registered exporters in the DRC for further processing for use in electronic components, jewelry, or gold bars.

Despite the existence of an official supply chain, almost all ASM gold is smuggled out of the DRC and is therefore not reflected in official export statistics or subject to provincial or national taxes, according to reports we

²⁵According to a USAID report, production taxes for North Kivu Province, South Kivu Province, Maniema Province, and Orientale Province in 2015 were 10 percent, 10 percent, 11 percent, and 5 percent, respectively, and accounted for 90 percent of the DRC's ASM gold production. To estimate an average provincial production tax, we weighted these tax rates by estimated production volume for each province.

²⁶Blore, *Capacity Building for a Responsible Minerals Trade*.

reviewed as well as stakeholders we interviewed.²⁷ These sources indicate that smuggling activities often begin at the mine site and involve both registered and unregistered actors. For example, ASM gold miners mine for gold at undesignated sites and sell it to both registered and unregistered local traders.²⁸ Unregistered traders purchase gold at or near mining areas and either sell the gold to larger registered or unregistered traders or exporters located in regional trading centers in the DRC—for example, in Bukavu, South Kivu Province, or Butembo, North Kivu Province—or smuggle the gold from the DRC themselves, according to USAID and UNGoE reports reflecting fieldwork completed in 2014 and 2016.²⁹ Registered local traders also participate in smuggling by selling gold to unregistered exporters and to regional and global buyers outside the DRC. Additionally, registered exporters participate in smuggling by

²⁷ See Blore, *Capacity Building for a Responsible Minerals Trade*; United Nations, *Letter Dated 22 January 2014 from the Coordinator of the Group of Experts on the Democratic Republic of the Congo Addressed to the President of the Security Council, S/2014/42* (Jan. 23, 2014); Southern Africa Resource Watch, *Congo's Golden Web: The People, Companies and Countries That Profit from the Illegal Trade in Congolese Gold* (May 2014); *Letter Dated 23 May 2016 from the Group of Experts*; U.S. Department of the Interior, *Conflict Minerals from the Democratic Republic of the Congo—Gold Supply Chain*. (Reston, Va.: U.S. Geological Survey, October 2015); Gregory Mthembu-Salter, *Baseline Study Three: Production, Trade and Export of Gold in Orientale Province, Democratic Republic of Congo* (Paris, France: Organisation for Economic Co-operation and Development, May 2015). Gregory Mthembu-Salter, *Baseline Study Four: Gold Trading and Export in Kampala, Uganda* (Paris, France: Organisation for Economic Co-operation and Development, May 2015). Global Witness, *City of Gold*; Jocelyn Kelly, *This Mine Has Become Our Farmland*. While no available statistics show definitively that most ASM gold is smuggled from the DRC, three reports that we reviewed reached this conclusion independently: a 2014 UNGoE analysis contrasting official DRC gold export statistics with estimates of DRC ASM gold production (roughly 98 percent smuggled), a 2015 USAID analysis of export data from neighboring countries to estimate smuggled tonnage (about 97 percent evaded taxes), and a 2014 NGO estimate based on extensive interviews with companies operating in the DRC (no figure specified).

²⁸Blore, *Capacity Building for a Responsible Minerals Trade*. According to this 2015 USAID study, the lack of designated artisanal mining areas limits opportunities for miners to operate through legal channels.

²⁹Blore, *Capacity Building for a Responsible Minerals Trade*. *Letter Dated 22 January 2014 from the Coordinator of the Group of Experts*; *Letter Dated 23 May 2016 from the Group of Experts*. Additionally, gold production at mine sites is typically controlled by a pit boss or cooperative president with ties to smugglers, according to this USAID study based on fieldwork completed in 2014. According to this USAID study, pit bosses and cooperative presidents are sometimes prefinanced by unregistered traders responsible for smuggling gold out of the DRC. The study notes that, because gold production that has been prefinanced is often pledged to the prefinancer, ASM gold becomes part of smuggling channels before it is mined. Also see United Nations, *Letter Dated 23 May 2016 from the Group of Experts*; Gregory Mthembu-Salter, *Baseline Study Three*.

underreporting their exports of ASM gold to avoid taxes, according to reports reflecting fieldwork completed in 2014 through 2016.³⁰ A UNGoE study estimated that unreported exports of ASM gold from the DRC and neighboring countries in the first 9 months of 2015 amounted to about \$200 million. Some of the factors that contribute to smuggling include limited government control over the remote areas where ASM gold is primarily produced, inadequate infrastructure, and corruption, according to reports we reviewed and DRC government officials we interviewed. DRC government officials told us that smuggling is also a consequence of weak border enforcement. Reports we reviewed indicate that the smuggling of ASM gold from the DRC has resulted in a substantial loss of tax revenue.³¹

Most ASM gold produced in the DRC is smuggled through regional buyers in neighboring African countries and then to Dubai, UAE, according to several reports.³² UNGoE, OECD, and NGO officials told us that gold buyers located outside the DRC—for example, in Uganda—often rely on networks of traders who purchase gold at mines in the eastern DRC and smuggle it out of the country. These sometimes-complex supply chain networks include traders and exporters who are often from other countries in the region or from China, India, the Middle

³⁰United Nations, *Letter Dated 23 May 2016 from the Group of Experts*; Mthembu-Salter, *Baseline Study Two*; Southern Africa Resource Watch, *Congo's Golden Web*; Blore, *Capacity Building for a Responsible Minerals Trade*.

³¹Blore, *Capacity Building for a Responsible Minerals Trade*; United Nations: *Letter Dated 22 January 2014 from the Coordinator of the Group of Experts*; Southern Africa Resource Watch, *Congo's Golden Web*; *Letter Dated 23 May 2016 from the Group of Experts*; Gregory Mthembu-Salter, *Baseline Study Three*; Mthembu-Salter, Gregory. *Baseline Study Four*. The reports we reviewed estimated amounts of lost DRC tax revenue on the basis of assumptions about the proportion of ASM gold smuggled and official DRC tax rates. While the reports' estimates of lost tax revenue varied, all of these estimates were much larger than the estimated amounts of collected official taxes.

³²Blore, *Capacity Building for a Responsible Minerals Trade*; United Nations, *Letter Dated 23 May 2016 from the Group of Experts*; United Nations, *Letter Dated 22 January 2014 from the Coordinator of the Group of Experts*; Gregory Mthembu-Salter, *Baseline Study Two: Mukungwe Artisanal Mine, South Kivu, Democratic Republic of Congo* (Paris, France: Organization for Economic Co-operation and Development, November 2014); Fidel Bafilemba and Sasha Lezhnev, *Congo's Conflict Gold Rush: Bringing Gold into the Legal Trade in the Democratic Republic of Congo* (Washington, D.C.: Enough Project, April 2015); Global Witness, *City of Gold: Why Dubai's First Conflict Gold Audit Never Saw the Light of Day* (London, United Kingdom: February 2014); Partnership Africa Canada, *All That Glitters Is Not Gold: Dubai, Congo and the Illicit Trade of Conflict Minerals* (Ottawa, Canada: May 2014). Information we reviewed from these reports is based on field work completed in 2013 through 2016.

East, or Europe, according to an OECD representative. Reports we reviewed and stakeholders we interviewed also noted that ASM gold smuggled from the DRC is typically transported from Dubai to other international markets such as India or Switzerland.³³

Since 2012, the Dubai Multi Commodities Centre, a UAE government entity, has provided guidelines on responsible sourcing to gold refiners through its accreditation program. However, joining the program is voluntary, and the entity's jurisdiction does not include all refineries in the UAE, according to Dubai Multi Commodities Centre officials.³⁴ In interviews, Dubai government officials and refiners and a representative of an auditing firm told us that accredited refiners generally do not purchase gold directly from the DRC or most adjoining countries (see app. II for a map showing the countries adjoining the DRC). Furthermore, these individuals noted that refiners take various actions to ensure that gold sourced from these countries does not enter their supply chains. However, the refiners also acknowledged having purchased gold in the local gold market in Dubai (known as the gold souk), despite the fact that, according to a UNGoE report, traders and jewelers operating in the souk may have purchased gold from the DRC. In interviews, traders and jewelers at the gold souk told us that they required minimal documentation and generally did not ask questions about country of origin when buying gold. For example, one trader told us he was willing to purchase up to 50 kilograms of gold without any source-of-origin documentation. As a result, the extent of comingling of gold from the souk and gold from refiners who follow responsible sourcing guidelines is unclear.

³³Global Witness, *City of Gold*; Partnership Africa Canada, *All That Glitters Is Not Gold*; Bafilemba and Lezhnev, *Congo's Conflict Gold Rush*.

³⁴The Dubai Multi Commodities Centre is a government entity established in 2002 to enhance commodity trade flows through Dubai.

Armed Groups Reportedly Interfere at ASM Gold Mine Sites in Several Ways, Including Imposing Illegal Taxes on Miners

In recent years, progress has been made in reducing the presence of armed groups at tantalum, tin, and tungsten mine sites, according to UNGoE, OECD, and IPIS reports.³⁵ However, the widespread availability of gold in remote, difficult-to-access areas of the eastern DRC and the lack of a functioning traceability system allow armed groups to operate at gold mine sites with minimal government and international oversight. According to reports we reviewed and stakeholders we interviewed, interference by armed groups of state and nonstate actors occurs primarily at mine sites through, among other things, illegal taxation and control of mining areas, pillaging, and forced labor.³⁶ For example, a 2016 IPIS study found that, as of 2015, an estimated 64 percent of ASM gold miners worked at mines with state and nonstate armed group interference.³⁷ Armed groups have also been known to operate illegal road barriers, where they collect revenue from miners or traders transporting gold. Furthermore, according to the IPIS study and UNGoE

³⁵Weyns, Hoex, and Matthysen, *Analysis of the Interactive Map of Artisanal Mining*; United Nations, *Letter Dated 23 May 2016 from the Group of Experts*; United Nations, *Letter Dated 22 January 2014 from the Coordinator of the Group of Experts*; Organization for Economic Co-operation and Development, *Mineral Supply Chains and Conflict Links in Eastern Democratic Republic of Congo: Five Years of Implementing Supply Chain Due Diligence* (Paris, France: Nov. 19, 2015); Holly Dranginis, *Point of Origin: Status Report on the Impact of Dodd-Frank 1502 in Congo* (Enough Project, February 2016). Analysis is based on IPIS fieldwork conducted from 2013 to 2015 and on UNGoE and NGO fieldwork completed in 2016.

³⁶Weyns, Hoex, and Matthysen, *Analysis of the Interactive Map of Artisanal Mining Areas*; United Nations, *Letter Dated 23 May 2016 from the Group of Experts*; Mthembu-Salter, *Baseline Study Two*; Mthembu-Salter, *Baseline Study Four*, Bafilemba and Lezhnev, *Congo's Conflict Gold Rush*; Kelly, Jocelyn. *This Mine Has Become Our Farmland*; United Nations, *Letter Dated 12 January 2015 from the Chair of the Security Council Committee Established Pursuant to Resolution 1533 (2004) Concerning the Democratic Republic of the Congo Addressed to the President of the Security Council* (New York, N.Y.: Jan. 12, 2015). Nonstate armed groups include both domestic groups such as the Mai Mai and the Union Pour La Protection Des Innocents and foreign groups such as the Democratic Forces for the Liberation of Rwanda.

³⁷Weyns, Hoex, and Matthysen, *Analysis of the Interactive Map of Artisanal Mining Areas*. IPIS gathered data from 2013 to 2015 by sending teams to conduct site visits at 1,615 gold, tantalum, tin, and tungsten mines in the DRC. These site visits included interviews with multiple individuals at various levels of seniority at the mine sites about mining activities and armed group presence and interference. IPIS data may underestimate armed group presence in the DRC as a whole because teams were unable to visit certain regions considered too high risk or mine sites in remote areas, among other reasons, according to IPIS officials. While IPIS teams reported revisiting 200 mines in 2015 that IPIS had visited in 2013 and 2014, IPIS data do not reflect changes that may have occurred at other mines during this period.

officials, most instances of armed group interference at mining sites involve illegal taxation. As of 2016, among the conflict minerals, gold provided by far the most significant financial benefit to armed groups, according to UNGoE.

Elements of the Armed Forces of the Democratic Republic of the Congo (FARDC) constitute the largest armed presence and source of interference at gold mine sites, according to the 2016 IPIS study.³⁸

According to DRC government officials, although FARDC is present to maintain security at or around gold mine sites, some undisciplined FARDC elements have interfered at mining sites. However, these officials noted that the military is working to bring such elements under control by taking legal action against FARDC officers and soldiers found to be in violation of the law. In addition, a report by the Congo Research Group, based on fieldwork conducted in 2015, indicates that fragmentation has greatly increased among illegal nonstate armed groups in eastern DRC.³⁹ With the disappearance or weakening of armed groups such as the March 23 Movement and the Democratic Forces for the Liberation of Rwanda from the DRC, illegal armed groups are now smaller and more fragmented, tending to pillage mines rather than impose permanent control, according to IPIS representatives. IPIS representatives noted that FARDC elements, in contrast, tend to impose more permanent control and illegal taxation.

DRC Government's, USAID's, and Other Entities' Efforts to Encourage Responsible Sourcing of ASM Gold

The DRC government and USAID, as well as several other entities, have undertaken initiatives to encourage the sourcing of conflict-free ASM gold from the DRC. However, some of these initiatives face challenges, such as the limited number of validated mine sites, as well as ongoing security risks.

³⁸The 2016 IPIS study notes that 64 percent of ASM gold miners worked in the presence of an armed group and that more than half of the armed groups included FARDC elements.

³⁹Jason Stearns and Christoph Vogel, *The Landscape of Armed Groups in the Eastern Congo* (New York: N.Y.: Congo Research Group: Center on International Cooperation, December 2015)

DRC Government Initiatives

To mitigate supply chain–related concerns, in 2015, the DRC government developed the Traceability Initiative for Artisanal Gold (ITOA) to establish conflict-free sources of ASM gold. ITOA relies on a system of tamper-proof envelopes and agents to track and certify the source and chain of custody of gold. The DRC government seeks to implement ITOA at mining sites that have been validated as “green” (i.e., conflict free, with no child labor) and are located in officially designated ZEAs.⁴⁰ According to USAID documents, the DRC government aims to pilot ITOA at two mine sites in the Maniema and South Kivu provinces and to scale the system on the basis of the pilot. DRC officials told us that they expect the ITOA pilot to be launched in the summer of 2017.

However, the limited number of mine sites that have been validated and thus licensed to operate, as well as the relatively high provincial taxes in the mining sector in the DRC compared with taxes in neighboring countries, as reported by USAID and UNGoE, continue to limit incentives for sourcing conflict-free ASM gold.⁴¹ For example, as of April 2016, only 37 of more than 1,000 ASM gold mine sites had been validated as green, according to a DRC government accredited joint validated mission.⁴² The government’s ability to validate mines has been hindered by factors such as insecure conditions and lack of funding, according to a 2015 report by the Enough Project.⁴³ Furthermore, relatively high government taxes discourage actors along the supply chain from selling gold through legal channels, according to reports we reviewed and stakeholders we interviewed. A USAID report found that regional tax rates in the DRC and neighboring countries had been largely equalized but that provincial taxes

⁴⁰According to the ICGLR validation scheme, a “green” mine meets all standards (i.e., no conflict or child labor) and can produce minerals for certified export.

⁴¹Other factors such as a lack of a scalable traceability system for gold, responsible buyers, political will on the part of the Government of the DRC, and ZEAs for gold also impact the gold sector, according to USAID officials.

⁴²Of the 53 gold mine sites inspected in the DRC in 2011 through 2016, 37 were classified as green, 5 as yellow, and 6 as red, while 5 were not classified, according to a summary report by the Joint Mine Site Validation Mission.

⁴³Bafilemba and Lezhnev, *Congo’s Conflict Gold Rush*.

in the DRC remained high.⁴⁴ For example, Support Service and Management of Small Scale Mining, or SAESSCAM—a provincial government entity—requires miners to pay a 10-percent production tax in addition to other fees, according to a USAID document. SAESSCAM is responsible for providing training in safe and effective mining techniques, among other things, but focuses primarily on collecting taxes from miners, according to USAID and OECD reports we reviewed.⁴⁵

USAID Initiatives

USAID is assisting the DRC government in its efforts to encourage the responsible sourcing of conflict-free ASM gold and provides training to mining cooperatives and government officials in the mining sector.⁴⁶ Since 2015, USAID has partnered with the DRC government to assist with implementing ITOA, including helping to validate mine sites. In addition, since 2016, USAID has worked with Tetra Tech through the Capacity Building for Responsible Minerals Trade Program and Partnership Africa Canada (PAC) through the Just Gold project to scale up pilot initiatives for the production and sale of ASM gold.⁴⁷ The pilot is focused on increasing the volume of conflict-free gold and improving the integrity of traceability systems in the DRC. For example, miners are taught more-sustainable exploitation techniques and offered project equipment. As of March 2017, the Just Gold project had exported about

⁴⁴Blore, *Capacity Building for a Responsible Minerals Trade*. According to this USAID report, official royalties and taxes are paid to the national government with a portion of those amounts to be returned to the provincial governments. However, in practice, DRC provincial governments impose a percentage of tax for each actor in the supply chain. Although the legality of these provincial taxes is questionable, national authorities have largely allowed the practice to continue, according to USAID documents.

⁴⁵Blore, *Capacity Building for a Responsible Minerals Trade*; Gregory Mthembu-Salter, *Baseline Study One: Musebe Artisanal Mine, Katanga Democratic Republic of Congo* (Paris, France: Organization for Economic Co-operation and Development, May 2014).

⁴⁶Tetra Tech, USAID's implementing partner for the training, has a \$14.7 million cost-plus-fixed-fee contract with USAID that was initiated on July 1, 2014, and is expected to end on December 31, 2018.

⁴⁷Partnership Africa Canada's (PAC) Just Gold project, funded by the U.S. and Canadian governments, is being implemented at one mine site in Ituri Province. According to USAID officials, the 2016 pilot will expand the Just Gold project and is designed to create incentives for artisanal miners to channel their production to legal exporters by providing technical assistance (i.e., training and equipment) to miners in return for their committing to track any gold produced and sell it through legal channels. USAID began to fund PAC's Just Gold project in 2016 in an effort to expand and build on PAC's infrastructure and technical expertise in developing traceability schemes for ASM gold, according to USAID documents.

1,429 grams (1.4 kilograms) of ASM gold.⁴⁸ Table 2 shows the two pilot projects USAID had initiated as of June 2017 to develop and expand existing traceability schemes for ASM gold produced in the DRC.

Table 2: USAID-Initiated Pilot Projects for Developing Traceability Schemes for ASM Gold Produced in the DRC, as of June 2017

| Pilot project | Locations | Objective | Start date | End date | Target |
|---------------|---|--|--------------|---------------|--|
| 1 | Lubondozi, Kambwe, Kamungazi, and Katuma (Maniema and South Kivu Province) | Support the Democratic Republic of the Congo (DRC) government's effort to develop the Traceability Initiative for Responsible Gold, to track ASM gold from validated mine sites in the DRC to global buyers. | October 2015 | December 2018 | 25 mine sites with traceability schemes ^a |
| 2 | Tokomeka and Unipe Ni Kupe (Ituri Province) | Work with Partnership Africa Canada to expand existing schemes to track ASM gold from validated mine sites to legal exporters in the DRC. | April 2016 | December 2018 | |

Legend: ASM = artisanal and small-scale mined

Source: GAO analysis of U.S. Agency for International Development (USAID) reports. | GAO-17-733

Note: Through its Capacity Building for Responsible Minerals Trade Program, implemented by Tetra Tech, USAID identified two other potential pilot sites, in Bikenge (Maniema Province) and Nyamurahle (South Kivu Province), in 2016 but had not initiated the pilots as of June 2017.

^aThe combined target for the two pilot projects is 25 mine sites with traceability and due diligence schemes.

USAID progress reports cite the limited number of buyers, including refiners, and security as key challenges affecting these pilot projects. According to USAID officials, some potential buyers are unwilling to purchase ASM gold from the DRC because of associated risks related to potential armed group interference. USAID officials also told us that the low volume of ASM gold available from the limited number of pilot mine

⁴⁸According to USAID progress reports, USAID also supports the DRC in its effort to reform the mining code in order to advance the formalization of the ASM sector and address the legal and policy loopholes that undermine a secure and conflict-free artisanal mining trade. For example, in 2017, USAID provided guidance to the DRC government to improve the implementation of traceability and due diligence systems and provided draft due diligence questionnaires to promote legal sourcing of ASM gold.

sites poses an additional challenge to attracting buyers. In interviews, Dubai Multi Commodities Centre officials and refinery representatives in Dubai told us that, while they do not currently purchase any ASM gold produced in the DRC, they would be open to exploring options to buy such gold if they had some assurance from a partner such as USAID. USAID officials explained that their current focus is on identifying London Bullion Market Association (LBMA) refiners, who examine their supply chains more closely. Additionally, ongoing security risks affect the implementation of pilot projects, according to USAID progress reports. For example, in February 2017, one of the potential pilot sites at Matete was attacked, leading to suspension of on-site activities. According to USAID documents, an armed group of approximately 30 men attacked several buildings in Matete, killing one military soldier and taking hostages. Contractor staff were immediately moved to another compound for security and were subsequently evacuated, unharmed.⁴⁹

In 2016, USAID established a pilot projects target of developing traceability and due diligence schemes for ASM gold at 25 mine sites. USAID met this target in December 2016, having developed traceability and due diligence schemes at 26 mine sites, primarily through the Just Gold project. USAID officials told us that they are supporting the development of a traceability scheme for ASM gold so that gold from validated sites can comply with ICGLR standards.

Other Entities' Initiatives

Other entities—OECD, ICGLR, and LBMA—have undertaken regional initiatives to encourage the responsible sourcing of gold.

- **OECD guidance.** Since 2012, OECD has developed guidance on encouraging responsible supply chains for ASM gold.⁵⁰ For example, the guidance notes that stakeholders should engage in legalizing and formalizing the artisanal mining communities to encourage conflict-free sourcing. In 2016, OECD reported that implementation of Section

⁴⁹According to USAID, the Matete pilot has been suspended due to security reasons.

⁵⁰Organization for Economic Co-operation and Development, *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*, 3rd ed. (Paris, France: OECD Publishing, 2016). OECD intends for its guidance to be used by any company potentially sourcing minerals or metals from conflict-affected and high-risk areas and, according to OECD, is one of the only international frameworks available to help companies meet their due diligence reporting requirements. The third edition includes supplemental guidance for gold for “downstream” supply chain companies.

1502 of the Dodd-Frank Act had increased awareness about the supply chain of conflict minerals in the region.

- **ICGLR regional certification mechanism.** In 2010, ICGLR developed a regional certification mechanism to ensure that conflict minerals, including gold, are fully traceable. However, two reports we reviewed raised concerns about the validity of ICGLR certificates issued to *comptoirs* exporting ASM gold, given that traceability schemes for ASM gold are lacking.⁵¹ In addition, UNGoE, OECD, and DRC officials told us that the ICGLR’s mechanism has not been fully implemented and is not adequately monitored owing to limited incentives for member states to accomplish regional goals.
- **LBMA accreditation.** In 2012, LBMA, which represents the global market for gold and silver, established its “Responsible Gold Guidance” to ensure that the gold refiners it accredits purchase only conflict-free gold.⁵² According to LBMA, compliance with this framework is mandatory for all refiners wishing to sell into the London bullion market. USAID officials told us that USAID is seeking to identify buyers from the LBMA refiners for its ASM gold pilot projects.

Additional Information on Sexual Violence in Eastern DRC Published since August 2016

Since we reported in August 2016,⁵³ a USAID-funded, population-based study published in 2016 has provided additional data on sexual violence in the DRC. In addition, as we previously reported, population-based surveys on sexual violence are under way or planned in two adjoining countries, Burundi and Uganda. We also identified some new case-file data on sexual violence in the DRC and adjoining countries; however, as we reported previously, case-file data on sexual violence are not suitable for estimating an overall rate of sexual violence. Finally, a 2017 UN report indicates that the DRC government has made some progress in addressing sexual violence.

⁵¹Mthembu-Salter, *Baseline Study Three*; Blore, *Capacity Building for a Responsible Minerals Trade*.

⁵²In interviews, officials of the Dubai Multi Commodities Centre told us that the center is undergoing an independent alignment assessment aimed at determining the comparability of its “Rules for Risk Based Due Diligence in the Gold and Precious Metals Supply Chain” with other industry schemes. These officials noted that preliminary conclusions of the assessment indicate that there are no material gaps between the center’s rules and the LBMA’s guidance.

⁵³[GAO-16-805](#).

USAID-Funded Study Provides Additional Data on Sexual Violence in the DRC, and Studies for Adjoining Countries Are Under Way

We identified a USAID-funded, population-based study surveying the rate of sexual violence in the eastern DRC that had been published since August 2016.⁵⁴ Published in September 2016, the study used data collected in June and July 2016 to estimate that 31.6 percent of women and 32.9 percent of men reported exposure to some form of sexual and gender-based violence in their lifetime. Among women who were exposed to sexual violence, 12.7 percent reported exposure to conflict-related sexual violence, while 87.4 percent reported exposure to community-based sexual violence.⁵⁵ Among men who were exposed to sexual violence, 68.1 percent reported exposure to conflict-related sexual violence, while 31.9 percent reported exposure to community-based sexual violence.

Table 3 summarizes the results of this and other selected, population-based surveys of the rate of gender-based sexual violence in the DRC that have been published since 2008.⁵⁶ The surveys' results are not directly comparable because of variations in the periods of reported incidents, the genders and ages of survey participants, and the geographic areas covered, as well as the definitions of sexual violence used. For example, while the August 2010 survey estimated the rate of sexual violence over a lifetime, other surveys estimated the rate of sexual violence over both a lifetime and a 12-month period. Additionally, some surveys collected information only on women, while others surveyed both men and women.

⁵⁴Overseas Strategic Consulting, Ltd., and IMA World Health, *A Population-Based Household Study to Assess Practical Strategies of Prevention and Response to Sexual and Gender Based Violence in Katana, Walikale, and Karisimbi Health Zones, DRC* (Washington, D.C.: U.S. Agency for International Development, September 2016).

⁵⁵In the 2016 USAID study, "conflict-related sexual violence" is defined as sexual violence perpetrated by a combatant as identified by the victim, while "community-based sexual violence" is defined as sexual violence perpetrated by a noncombatant as identified by the victim, who may or may not know the perpetrator.

⁵⁶We have previously reported on these other selected population-based studies. For additional information, see [GAO-11-702](#) and GAO, *SEC Conflict Minerals Rule: Initial Disclosures Indicate Most Companies Were Unable to Determine the Source of Their Conflict Minerals*, [GAO-15-561](#) (Washington, D.C.: Aug. 18, 2015).

Table 3: Selected Population-Based Studies of Sexual and Gender-Based Violence in the Democratic Republic of the Congo (DRC), 2008-2016

| Surveys and publication date | Survey participants | Estimated rate of reported sexual violence (percentage) | | | | Data collection period | Survey area |
|--|--|---|-----|-----------------------|------|------------------------------|---|
| | | Previous 12 months | | Lifetime ^a | | | |
| | | Women | Men | Women | Men | | |
| USAID-funded Ushindi study Sept. 2016 ^b | Males and females 18 years and older or emancipated minors | 5.3 | 6.1 | 32 | 33 | June 20, 2016– July 20, 2016 | Katana, Walikale, and Karisimbi in North and South Kivu provinces |
| DRC Ministry of Planning Sept. 2014 ^c | Females aged 18-49 years | 17 | NA | 29 | NA | Nov. 2013– Feb. 2014 | Nationwide ^c |
| USAID-funded Social Impact survey Aug. 2014 ^d | Males and females 15 years and older | 7.1 | 1.2 | — | — | April 2014 – May 2014 | Kalehe, Walungu, and Mwenga territories in South Kivu Province and Kalemie and Nyunzu territories in North Katanga Province |
| McGill University Aug. 2010 ^e | Males and females 18 years and older | — | — | 39.7 | 23.6 | Mar. 2010 | Territories in North Kivu and South Kivu provinces and Ituri district in Orientale Province |
| DRC Ministry of Planning Aug. 2008 ^d | Females aged 18-49 years | 28 | NA | 36 | NA | Jan. 2007– Aug. 2007 | Nationwide ^d |

Legend: NA = not applicable; — = data not collected; USAID = U.S. Agency for International Development
 Source: GAO analysis of population-based surveys. | GAO-17-733

Notes: According to the United Nations, sexual and gender-based violence includes any act that is perpetrated against a person’s will and is based on gender norms and unequal power relationships.

^a“Lifetime” refers to whether a person reported experiencing sexual violence at any point in their life.

^bOverseas Strategic Consulting, Ltd., and IMA World Health, A Population-Based Household Study to Assess Practical Strategies of Prevention and Response to Sexual and Gender Based Violence in Katana, Walikale, and Karisimbi Health Zones, DRC (Washington, D.C.: U.S. Agency for International Development, September 2016).

^cThe estimates include data for Orientale Province but do not provide estimates on the rate of violence for the Ituri district, located within Orientale Province. For additional information on this study, see [GAO-15-561](#).

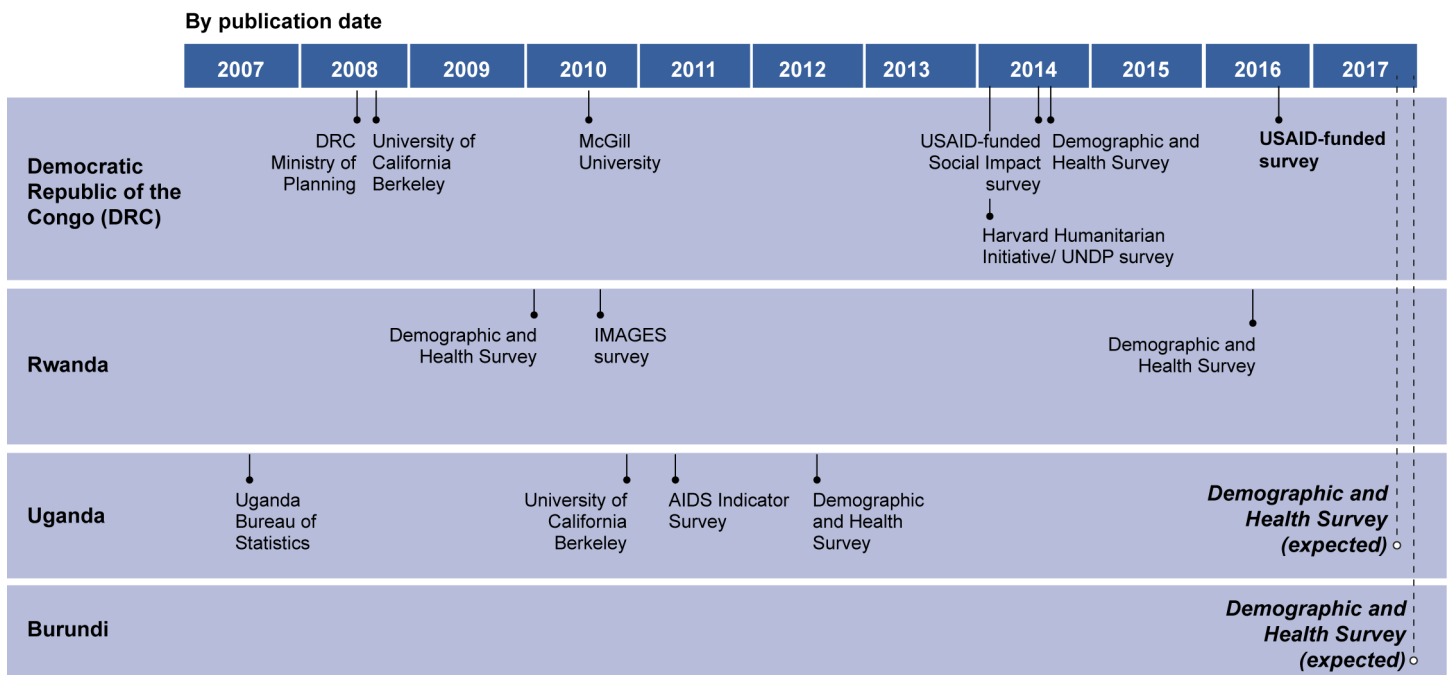
^dSee [GAO-15-561](#).

^eSee [GAO-11-702](#).

In addition to these studies of sexual violence in the eastern DRC, population-based surveys in Uganda and Burundi are under way or planned, as we previously reported. According to ICF International, fieldwork for the 2016 Uganda Demographic and Health Survey is now

complete, and the final report is expected in October 2017; fieldwork for the 2016 Burundi survey is currently ongoing, and the final report is expected in December 2017. Figure 3 shows the anticipated publication dates for population-based surveys on sexual violence that are currently under way or planned in Uganda and Burundi. The figure also shows the publication dates for the population-based surveys, with data on rates of sexual violence in the eastern DRC, Rwanda, and Uganda that have been published since we started reporting on sexual violence in the region in 2011.

Figure 3: Population-Based Surveys of Sexual Violence Rates in Eastern DRC, Rwanda, Uganda, and Burundi, by Actual or Expected Publication Date



Source: GAO analysis. | GAO-17-733

Some Additional Case-File Information about Sexual Violence Has Become Available since August 2016

Since we reported in August 2016, State and UN entities have provided additional case-file information about instances of sexual violence in the DRC and adjoining countries. State's annual country reports on human rights practices provided the following case-file data pertaining to sexual violence in the DRC, Burundi, Rwanda, and Uganda:⁵⁷

- **DRC.** In 2016, the United Nations documented 267 adult victims and 171 child victims of sexual violence in conflict. This violence was perpetrated by illegal armed groups as well as state security forces and civilians and was concentrated in North Kivu Province, according to State.
- **Burundi.** One organization—Seruka Center—working with victims of sexual violence in Bujumbura reported 1,288 cases of sexual assault during 2016. According to State, the actual number of rapes was likely higher, given factors that prevent women and girls from seeking medical treatment. Another organization—Humura Center—responsible for investigating cases of sexual violence and rape received 160 cases of sexual and gender-based violence in 2016, according to State.
- **Rwanda.** In 2016, Rwanda's National Public Prosecution Authority reported 190 cases of rape. According to State's report, domestic violence against women in 2016 was common, but most incidents were not reported or prosecuted.
- **Uganda.** State's 2016 report reiterated that rape remained a serious problem throughout the country and that the government did not consistently enforce the law. As we noted previously, the police crime report through June 2015, the most recent available, registered 10,163 reported sexual offenses.

⁵⁷U.S. Department of State, Bureau of Democracy, Human Rights, and Labor, *Country Reports on Human Rights Practices for 2016*, accessed June 28, 2017, <https://www.state.gov/j/drl/rls/hrrpt/humanrightsreport/index.htm#wrapper>.

In addition, UN entities reported the following case-file data about sexual violence in the DRC and Burundi:⁵⁸

- **DRC.** Data collected by the Congolese government with support from the UN Population Fund indicate that from January 2016 through March 2017, gender-based violence service providers responded to at least 24,364 incidents of gender-based violence. Women and girls were the victims in 97 percent of the reported cases in 2016.⁵⁹ In addition, in 2016, the UN Organization Stabilization Mission in the DRC, known as MONUSCO, verified 637 cases of conflict-related sexual violence, with illegal armed groups responsible for 74 percent of cases, and state security forces, mainly FARDC, responsible for the remaining 26 percent of cases.
- **Burundi.** In 2016, UNHCR—the UN Refugee Agency—reported 2,250 gender-based violence incidents targeting refugees in neighboring countries, with 23 percent of incidents occurring in Burundi or en route from the country.

UN Reports DRC Government Has Made Some Progress in Addressing Sexual Violence

Since 2013, the DRC government has made some progress in addressing sexual violence in the eastern DRC, according to a 2017 UN report.⁶⁰ The report notes improvements in the capacity of DRC state security forces to address sexual violence in the following respects:

- adoption of codes of conduct prohibiting sexual violence;
- investigation of alleged incidents in order to hold perpetrators accountable; and
- formation of specialized police units capable of addressing sexual violence.

⁵⁸As we previously reported, several factors make case-file data unsuitable for estimating rates of sexual violence. First, because case-file data are not aggregated across various sources, and because the extent to which various reports overlap is unclear, it is difficult to obtain complete data or a sense of magnitude from case files. Second, in case-file data as well as in surveys, time frames, locales, and definitions of sexual violence may be inconsistent across data collection operations. Third, case-file data are not based on a random sample, and the results of analyzing these data are not generalizable. See [GAO-16-805](#).

⁵⁹The number of civilians who perpetrated gender-based violence during this period declined from 69 percent in 2016 to an estimated 53 percent in the first quarter of 2017.

⁶⁰United Nations Security Council, *Report of the Secretary-General on Conflict-Related Sexual Violence*, S/2017/249 (New York, N.Y.: Apr. 15, 2017).

In addition, law enforcement measures such as arrests and prosecutions have increased, and training for the military has improved, according to an official from the UN Special Representative of the Secretary-General on Sexual Violence in Conflict. This official also noted that in 2014, the DRC government appointed a Personal Representative to the President on Sexual Violence and Child Recruitment to advise the President on sexual violence issues, ensuring that sexual violence remains on the government's agenda. More recently, the DRC government and the United Nations have expressed interest in exploring linkages between mining and sexual violence, according to this official. However, the official told us that while reports suggest a link between mining and sexual violence in the region, the UN and the DRC government have not been able to prove such a linkage because of limited resources for travel to the areas where mining occurs and the limited availability of women with specialized knowledge to investigate these issues.

Agency Comments

We provided a draft of this report to the SEC, State, and USAID for comment. State and USAID provided technical comments, which we incorporated as appropriate. SEC did not provide comments.

We are sending copies of this report to appropriate congressional committees and to the SEC, State, and USAID. The report is also available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-8612 or gianopoulosk@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix III.



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The Honorable Thad Cochran
Chairman

The Honorable Patrick Leahy
Ranking Member
Committee on Appropriations
United States Senate

The Honorable Michael Crapo
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Appendix I: Objectives, Scope, and Methodology

In this report, we provide information about (1) the supply chain for gold produced through artisanal and small-scale mining in the Democratic Republic of the Congo (DRC); (2) efforts by the DRC and the U.S. government and others that may encourage the sourcing of conflict-free artisanal and small-scale mined (ASM) gold; and (3) sexual violence in the eastern DRC and neighboring countries that has been published since August 2016, when we last reported on this topic.¹

To address our first two objectives, we reviewed key reports and documents from the U.S. Agency for International Development (USAID), international organizations, and nongovernmental organizations (NGO). We reviewed these reports for methodological rigor, relevance, and timeliness to ensure that they were sufficiently reliable to support their own conclusions or conclusions we made based on their work. We also reviewed these reports' methodologies related to site selection, sources and quality of evidence, and the nature and timing of fieldwork in the DRC. We reviewed U.S. agency documents, such as a 2015 USAID-funded report related to conflict minerals in the DRC, as well as USAID internal documents that included a program implementation plan and annual and quarterly internal progress reports on responsible sourcing of ASM gold in the DRC. We also reviewed annual reports by the United Nations Group of Experts (UNGoE) from 2011 through 2016, annual baseline reports on the DRC by the Organisation for Economic Co-operation and Development (OECD) from 2014 and 2015, and reports by NGOs such as the Enough Project and Global Witness. (For a complete listing of the documents we reviewed, see the bibliography at the end of this report.) In reviewing these reports, we focused on discussion of the ASM gold supply chain; associated barriers and incentives, if any; and efforts to encourage responsible sourcing. We also interviewed Department of State (State), USAID, and United Nations (UN) officials and OECD and NGO representatives. We traveled to Dubai, United Arab Emirates, where we interviewed officials from the Ministry of Economy and Dubai Multi Commodities Centre, representatives of gold refineries, accounting firms, local traders, and jewelers. We interviewed DRC government officials in Santa Clara, California, and Washington, D.C., regarding the local supply chain for gold and efforts to ensure responsible sourcing.

¹[GAO-16-805](#).

To address our third objective, we identified and assessed any information on sexual violence in eastern DRC and the three adjoining countries—Rwanda, Uganda, and Burundi—that had been published or become otherwise available since we issued our August 2016 report on sexual violence in these areas.² We discussed the collection of sexual violence-related data in the DRC and adjoining countries, including population-based survey data and case-file data, during interviews with State and USAID officials and with NGO representatives and researchers whom we interviewed for our prior review of sexual violence rates in eastern DRC and adjoining countries. We also interviewed an official from the UN Special Representative of the Secretary-General on Sexual Violence in Conflict.

We conducted this performance audit from August 2016 to August 2017 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

²[GAO-16-805](#). We identified this information about sexual violence in the DRC and neighboring countries in response to a provision in the Dodd-Frank Wall Street Reform and Consumer Protection Act that GAO submit an annual report that assesses the rate of sexual violence in war-torn areas of the DRC and adjoining countries. Pub. L. No. 111-203, § 1502, 124 Stat. 1376, 2213-18.

Appendix II: Democratic Republic of the Congo Provinces and Adjoining Countries

The Democratic Republic of the Congo (DRC) is a vast, mineral-rich nation with an estimated population of about 75 million people and an area that is roughly one-quarter the size of the United States, according to the United Nations. Nine countries adjoin the DRC.¹ Figure 4 shows the DRC provinces and adjoining countries.

¹The nine countries adjoining DRC are Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

Figure 4: Democratic Republic of the Congo Provinces and Adjoining Countries



Source: GAO, based on United Nations map data. | GAO-17-733

Appendix III: GAO Contacts and Staff Acknowledgments

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Staff Acknowledgments

In addition to the individual named above, Godwin Agbara (Assistant Director), Farahnaaz Khakoo-Mausel (Analyst-in-Charge), Andrew Kurtzman, Elisa Yoshiara, Reid Lowe, Justin Fisher, Michael Hoffman, Grace Lui, and Neil Doherty made key contributions to this report.

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